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*Counsel for Lead Plaintiff Bradley Sostack*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

In re RIPPLE LABS, INC. LITIGATION

Case No. 4:18-cv-06753-PJH

This Document Relates to:

All Actions

**DECLARATION OF P. RYAN  
BURNINGHAM IN SUPORT OF LEAD  
PLAINTIFF'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
MATERIALS RELATING TO LEAD  
PLAINTIFF'S MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS AND  
PRIVILEGE LOG**

I, Ryan Burningham, hereby declare as follows:

1. I am an attorney in the law firm of Susman Godfrey, LLP. I am counsel for Lead Plaintiff Bradley Sostack. I am admitted *pro hac vice* to practice before this Court, and I have personal knowledge of the matters set forth herein. If called as a witness, I could and would testify competently thereto.

2. I make this declaration in support of Lead Plaintiff's Motion to File Under Seal Materials Relating to Lead Plaintiff's Motion to Compel Production of Documents and Privilege Log.

3. The documents below contain and describe information that has been designated by Defendants as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" pursuant to the parties' Stipulated Protective Order. *See* ECF No. 120 at §§ 2(B), 2(G).

Documents to be Filed Under Seal	Line Nos. to be Redacted / Sealed in Full
Portions of Lead Plaintiff's Motion to Compel Production of Documents and Privilege Log	9:12-13 9:15-16 16:4-9 16:12-13 16:17 17:14-15 17:17-18 17:24
Portions of the Declaration of P. Ryan Burningham in Support of Lead Plaintiff's Motion to Compel Production of Documents and Privilege Log	3:9-12 4:3-4 4:7-10
Exhibit 3 (RPLI_0004564)	Sealed in Full
Exhibit 4 (RPLI_00041073)	Sealed in Full
Exhibit 5 (RPLI_00301745)	Sealed in Full
Exhibit 7 (RPLI_00137882)	Sealed in Full
Exhibit 8 (RPLI_00296003)	Sealed in Full

1 I declare under penalty of perjury that the foregoing is true and correct.

2  
3 Signed this 8<sup>th</sup> day of February, 2021, at Seattle, WA.

4 By: /s/ P. Ryan Burningham

5 P. Ryan Burningham  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 8, 2021, I electronically filed the foregoing document with the clerk of the Court and served counsel of record via the CM/ECF system.

/s/ P. Ryan Burningham

P. Ryan Burningham